

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO.: 19-175  
v. \* SECTION: "E"  
ROMALIS HARRIS \*

\* \* \*

FACTUAL BASIS

Defendant **ROMALIS HARRIS** ("**HARRIS**") has decided to enter a plea of guilty to 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.

Agents with the Drug Enforcement Administration ("DEA") investigated the drug distribution activities of a group of individuals located in and around the parishes of Jefferson, Orleans, and St. Bernard. Agents identified the following individuals, among others, who were members of a drug distribution conspiracy: **HARRIS**, Thomas Landry, Corey Dunn, Bobby Franklin, a/k/a "B-Trey," a/k/a "Trey," Corey Enclarde, a/k/a "Murda," Demarco Ford, Christopher Harris, a/k/a "Grove," Michael Lewis, a/k/a "Michael Louis," Taurus Russell, a/k/a "Scrappy," and others.

AUSA BLP  
Defendant RH  
Defense Counsel MA

During the course of this investigation, agents obtained court-authorized Title III wiretap orders on four telephones: a telephone used by Franklin, a/k/a "B-Trey," a/k/a "Trey," telephone number [REDACTED] ("the 327 Wiretap"), a telephone used by Corey Dunn, telephone number [REDACTED] [REDACTED] ("the 439 Wiretap"), a telephone used by Corey Dunn, telephone number [REDACTED] [REDACTED] ("the 351 Wiretap"), and a telephone used by Corey Dunn, telephone number [REDACTED] [REDACTED] ("the 228 Wiretap").

Through this investigation, agents learned that Franklin and Dunn were a cocaine base (crack cocaine) and cocaine hydrochloride distribution network. Upon information and belief, the Franklin and Dunn drug trafficking organization ("DTO") began operating on or about October 2018 and continued to do so until on or about August 2, 2019. DEA agents were able to develop information about the charged conspiracy based on controlled purchases and intercepted communications between Franklin and Dunn and their co-conspirators.

Should this matter have proceeded to trial, DEA agents would testify that intercepted hundreds of telephone calls during his investigation of the Dunn/Franklin drug trafficking organization. During that time, agents heard members of the drug trafficking organization use code words to thwart law enforcement from intercepting communications related to drug trafficking/dealing. Additionally, agents would testify that based on his training and experience as a narcotics detective and his tenure as a task force officer with DEA, he has become familiar with the code language that drug dealers will often use to disguise conversations about narcotics activity. Agents became familiar with the code words used to refer to different types of controlled substances distributed and possessed with the intent to distribute by the organization, as well as quantities used distributed/possessed by the organization.

*July 25, 2019 purchase between Harris and Dunn*

On July 25, 2019, agents intercepted a communication between Dunn and **HARRIS** while intercepting communications during the 228 Wiretap. During the telephone call, **HARRIS**, utilizing telephone number [REDACTED] called Dunn. During the call, Dunn asked **HARRIS**, "What's happening, Unc?" **HARRIS** responded, "Nothing. Chillin, chillin, chillin, you coming outside today?" Dunn responded, "Yeah, what's happening?" **HARRIS** responded, "Nah, umm I wanted the four-dollar plate." The use of "four plate" in this context was a reference to four ounces of a controlled substance. **HARRIS** negotiated the purchase of four ounces (112 grams) of cocaine hydrochloride from Dunn in exchange for \$4,000.00 in U.S. currency. Dunn responded by telling **HARRIS** that he would have the amount for him the following day.

On the following day, **HARRIS** contacted Dunn, inquiring about "the white plate" for "the stack." Agents correctly interpreted this communication to mean that **HARRIS** was negotiating the purchase of cocaine hydrochloride, referred to as "white plate" by **HARRIS**, in exchange for \$1,000.00, referred to here as a "stack."

Shortly after their telephone communication, **HARRIS** and Dunn communicated met at an agreed upon location at which time **HARRIS** purchased 4 ounces (112 grams) of cocaine hydrochloride from Dunn.

*July 26, 2019 purchase between Harris and Dunn*

On July 26, 2019, at approximately 2:32 p.m., **HARRIS** contacted Dunn. **HARRIS** told Dunn, "I want you to come through on me again, you heard me? The same thing." Dunn replied, "Alright, you ready now?" **HARRIS** affirmatively answered. **HARRIS** and Dunn negotiated the sale of four ounces of cocaine hydrochloride (112 grams) in exchange for \$4,000.00.



Agents established surveillance at Dunn's residence and observed Dunn leave his residence and relocate to **HARRIS**'s residence. **HARRIS** purchased four ounces of cocaine hydrochloride from Dunn.

After meeting with Dunn, **HARRIS** contacted Dunn and told Dunn that he flushed "the plate", one ounce of cocaine hydrochloride, when he heard a knock at his door. **HARRIS** believed that law enforcement was at his residence. As a result, **HARRIS** asked Dunn to provide him with another ounce of cocaine hydrochloride. A short time after this telephone communication, Dunn arrived at **HARRIS**'s residence and sold **HARRIS** one ounce (28 grams) of cocaine hydrochloride in exchange for \$1,000.00.

*July 30, 2019 purchase between Harris and Dunn*

On July 30, 2019, at approximately 2:39 p.m., **HARRIS**, utilizing telephone number [REDACTED] [REDACTED] contacted Dunn. **HARRIS** stated, "Yeah I got umm, I got what-cha-call-em, you heard me? I got that what-cha-call-em I owe you, you heard me? I got sixteen all together you heard me?" Based on previous intercepted communications, agents learned that **HARRIS** owed Dunn money from a previous narcotics transaction. At that time, **HARRIS** told Dunn that he had an additional "sixteen" meaning \$16,000.00 that he wanted to use to purchase cocaine hydrochloride. **HARRIS** and Dunn negotiated the purchase. **HARRIS** stated, "I was trying to see if you could do the 'two ninjas' for me and let me bring you back the rack again." Two ninjas in this context is used to reference two quarter kilogram packages of cocaine hydrochloride (approximately nine ounces each or half a kilogram). **HARRIS** then told Dunn that he would pay full price for the "two ninjas."

Dunn replied, "Oh alright, oh yeah? Oh alright. So you want me to do two um, the nine ounces? I mean the nine plate things and you just owe me that stack?" Dunn then abruptly corrected

himself to state “nine plate things”. After negotiating the sale, **HARRIS** and Dunn agreed upon a meeting location. DEA established surveillance to confirm a meeting between **HARRIS** and Dunn. **HARRIS** and Dunn met at the agreed upon location. During the meeting, **HARRIS** purchased 18 ounces (504 grams) of cocaine hydrochloride from Dunn.



***Sentencing Stipulation***

For the purposes of sentencing only, the parties stipulate and agree that the defendant, **HARRIS**, is responsible for the following drug quantities through his own actions and the reasonably foreseeable actions of his co-conspirators. The parties agree that **HARRIS** is responsible for conspiring to distribute and/or possess with the intent to distribute at least 500 grams, but less than 2 kilograms of cocaine hydrochloride.

***Limited Nature of Factual Basis***

This proffer of evidence is not intended to constitute a complete statement of all facts known by **HARRIS**. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **HARRIS**'s plea of guilty to the charged offenses.

**READ AND APPROVED:**

|   |         |  |            |
|---|---------|--|------------|
|  | 6-14-21 |  | 06/14/2021 |
| NICHOLAS TRENICOSTA   | Date    | BRITTANY L. REED   | Date       |
| Counsel for Romalis Harris  |         | Assistant United States Attorney   |            |

|   |         |
|---|---------|
|  | 6-14-21 |
| ROMALIS HARRIS  | Date    |
| Defendant   |         |