

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-40

v. * SECTION: "B"

AARON NAKEENEN WOMACK *
a/k/a "Aarone Nakeenan Womack" *

* * *

FACTUAL BASIS

Should this matter proceed to trial, the United States of America will prove the defendant, **Aaron Nakeenen WOMACK, a/k/a "Aarone Nakeenan Womack" ("WOMACK")**, guilty beyond a reasonable doubt of distribution and possession with intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(B). The government would establish the following facts through credible testimony and the production of reliable evidence. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

On February 22, 2020, at approximately 2:00 p.m., a cooperating defendant ("CD") of the Livingston Parish Sheriff's Office ("LPSO") conducted a controlled purchase of approximately 6 ounces of methamphetamine utilizing High Intensity Drug Trafficking Area ("HIDTA") funds administered by Homeland Security Investigations ("HSI") from **WOMACK**. The controlled purchase was conducted under the direction, supervision, and surveillance of HSI. The purchase occurred at **WOMACK'S** part-time residence located at [REDACTED] Ponchatoula, Louisiana, which is within Tangipahoa Parish. The CD and his/her car were searched prior to conducting the controlled purchase, and the controlled purchase was video and audio recorded.

During this operation, the CD arrived at **WOMACK's** residence prior to his arrival. S/he waited for approximately an hour and a half prior to his arrival and waited in his/her car for **WOMACK**. During that waiting period, the CD was approached by two separate Black males who showed the CD quantities of methamphetamine. One of the men was loitering in the yard of the residence, and the other was in and out of the residence itself. Also, during this wait, the CD called **WOMACK'S** mother, Shawanda McKAY ("McKAY") to inquire about **WOMACK'S** whereabouts. The CD requested McKAY to contact **WOMACK** and tell him that the CD was at the residence waiting for him.

Upon **WOMACK'S** arrival, **WOMACK** made brief conversation with the CD. The CD observed **WOMACK** retrieve what s/he believed to be methamphetamine from the skirting on the south side of the residence, which is a mobile home. **WOMACK** then entered the residence from the door on the south side. A few minutes later, he emerged from the residence through the door on the north side and proceeded to the driver's side window of the CD's car. The CD remained in his/her car throughout the encounter. After a bit more conversation, including drug related conversation, **WOMACK** exchanged the methamphetamine with the CD for the \$2,000 of HIDTA funding. **WOMACK** gave \$200 back to the CD. The CD was followed back to a prearranged staging location where the methamphetamine was seized by HSI agents. A field test was positive for the presence of methamphetamine. Laboratory testing later confirmed the substance was approximately 161 grams of methamphetamine hydrochloride, which is actual methamphetamine.

On February 26, 2020, at approximately 11:15 a.m. hours, the CD conducted another controlled buy, using HIDTA funds, of approximately 4 ounces of methamphetamine from **WOMACK** at [REDACTED] Ponchatoula, LA. The controlled purchase was conducted under the direction, supervision, and surveillance of HSI, and was video and audio recorded. The

CD and his/her car were searched prior to conducting the controlled purchase. Furthermore, Customs and Border Protection ("CBP") aircraft video recorded the scene.

During this operation, the CD arrived at **WOMACK**'s residence prior to his arrival. S/he waited for approximately five minutes prior to his arrival and waited in his/her car for **WOMACK**. Upon his arrival, **WOMACK** went to the skirting on the south side of the residence and bent over. It appeared to agents conducting surveillance that he retrieved something, but they could not make out what he retrieved. **WOMACK** then entered the residence through the door on the south side. A few minutes later he emerged from the door on the north side of the residence. **WOMACK** then went back to the skirting of the trailer on the south side, but this time to a spot more to the west than the first time. He once again bent over and appeared to surveillance agents to retrieve something. However, agents could not make out what he retrieved. **WOMACK** then proceeded to the passenger side window of the CD's car and exchanged the methamphetamine with the CD for the \$1,200 of HIDTA funding. The CD was followed back to a prearranged staging location where the methamphetamine was seized by HIS agents. A field test was positive for the presence of methamphetamine. Laboratory testing later confirmed the substance was approximately 110 grams of methamphetamine hydrochloride, which is actual methamphetamine.

After completing the February 26 sale to the CD, **WOMACK** immediately got into the car he arrived in, a white 2018 Chevrolet Impala bearing Louisiana license plate [REDACTED]. A Black male exited the residence and conversed with **WOMACK** through the driver's window for a few minutes. After the conversation concluded, **WOMACK** departed south on Third Street. The CBP aircraft and ground surveillance units maintained surveillance on the vehicle. **WOMACK** stopped in the middle of East Willow Street between North First Street and North Second Street in Ponchatoula, Louisiana. **WOMACK** began to approach a car parked on the north side of East

Willow Street when Ponchatoula Police Department ("PPD") marked units and LPSO narcotics agents participating in the HSI operation approached and detained him. PPD [REDACTED] observed a pistol in the driver's side door compartment of **WOMACK's** vehicle in plain view when he moved the vehicle out of the roadway. A narcotics detecting K9 conducted an open air sniff of the vehicle and alerted to the presence of illegal narcotics. A search of the vehicle led to the discovery and seizure of a Bersa .380 caliber semiautomatic pistol, a Bersa .380 caliber magazine, and 8 rounds of .380 caliber ammunition. In addition, law enforcement recovered the \$1,200 used in the February 26 controlled purchase from **WOMACK's** person.

As the vehicle stop was taking place, HSI agents and the HPD Special Weapons and Tactics Team ("SWAT") executed a federal search warrant at the residence, [REDACTED] Ponchatoula, Louisiana. The search warrant was authorized by the Honorable Dana M. Douglas, U.S. Magistrate Judge, Eastern District of Louisiana. Execution of the search warrant led to the discovery and seizure of methamphetamine from under the residence, methamphetamine from a bedroom, heroin from under the siding by the skirting of the residence, and cocaine from under the siding by the skirting of the residence. Both quantities of methamphetamine seized from the residence were field tested and were positive for the presence of methamphetamine.

The government and **WOMACK** agree and stipulate that for sentencing purposes **WOMACK** will be held responsible for at least 150 grams but less than 500 grams of actual methamphetamine.

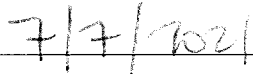
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **WOMACK** 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 **WOMACK's** plea of guilty to the charged offenses in Counts 2 and 3 of the Indictment.

READ AND APPROVED:



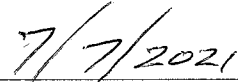
K. PAIGE O'HALE
Assistant United States Attorney



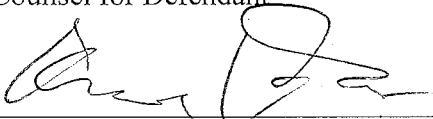
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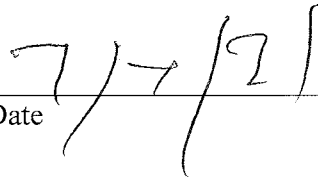
MICHAEL RASPANTI
Counsel for Defendant



Date



AARON NAKEENEN WOMACK
Defendant



Date