

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 20-85
v.	*	SECTION: "T"
KAHLIQ WILLIAMS	*	
	*	*

FACTUAL BASIS

The above-named defendant, **KAHLIQ WILLIAMS** (“**WILLIAMS**”), has agreed to plead guilty to Counts One through Four of the Indictment in the above-captioned case. Count One charges **WILLIAMS** with carjacking, in violation of Title 18, United States Code, §§2119(1) and 2. Count Two charges **WILLIAMS** with brandishing a firearm in furtherance of a crime of violence (carjacking), in violation of Title 18, United States Code §§ 924(c)(1)(ii) and 2. Count Three charges **WILLIAMS** with burglary of a federal firearms licensee, in violation of Title 18, United States Code, § 922(u). Count Four charges **WILLIAMS** with carjacking, in violation of Title 18, United States Code, §§ 2119(1) and 2. The facts outlined herein occurred within the jurisdiction of the Eastern District of Louisiana. 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:

On April 16, 2020, Richard Jones, **WILLIAMS**, and K.E. participated in a carjacking in the 5300 block of Eastern Street in New Orleans, LA. Jones, **WILLIAMS**, and K.E. intentionally took a 2017 gray Chevrolet Silverado (LA license plate [REDACTED]) a vehicle that had been transported, shipped, and received in interstate commerce, from G.H. by force, violence, and intimidation, with the intent to cause death and serious bodily harm. Specifically, **WILLIAMS**,

AUSA _____
Defendant _____
Defense Counsel _____

and his co-defendants and/or co-perpetrators used guns to threaten G.H. into giving the defendants his vehicle. Finally, **WILLIAMS** worked with Richard Jones and K.E. to plan and to execute the carjacking.

WILLIAMS admits that Richard Jones drove him and K.E. in a dark colored Nissan to the location. **WILLIAMS** admits that he, K.E., and Richard Jones, were all in possession of a firearm. **WILLIAMS** further admits that he and K.E. then exited the vehicle, and each was armed with a firearm. **WILLIAMS** and K.E. approached G.H. with brandished firearms and demanded G.H. get on the ground. **WILLIAMS** and K.E. then patted G.H. down and removed his car keys, iPhone, and wallet from his pockets. **WILLIAMS** and K.E. then entered the Chevrolet Silverado and fled the scene. G.H. notified the New Orleans Police Department ("NOPD") and advised them that two perpetrators approached him, both pointed firearms at him, and demanded he lay on the ground. G.H. also stated that they patted him down and stole several items. G.H. then stated the perpetrators got into his gray Chevrolet Silverado (LA License plate [REDACTED]) and fled the location.

WILLIAMS also admits that after the carjacking, he, Jones, and K.E. drove the stolen Chevrolet truck to C&S Gun Parlor, in Covington, LA. C&S Gun Parlor is a business which is federally licensed to engage in the business of the dealing, buying, and selling of firearms. **WILLIAMS** admits that he was seated in the back seat of the Chevrolet, K.E. drove the Chevrolet, and Richard Jones was seated in the passenger seat. They arrived at the location and then backed the vehicle through the front of the entrance of the store and stole several firearms. **WILLIAMS** admits that after the burglary they relocated to his mother's residence, split the firearms between the three of them, and abandoned the Chevrolet Silverado on St. Ferdinand near N. Miro Street in New Orleans, LA.

IP
KWR

Video surveillance of the C&S Gun Parlor burglary shows a Chevrolet pick-up truck with LA license plate [REDACTED] drive the rear end of the vehicle through the front entrance of the business, breaking a poll, glass doors, glass windows, and the metal gate. The time of the breach on the video was 1:15 AM. Three individuals wearing hoodies, masks, and gloves, exited the vehicle and proceeded to throw several firearms, including rifles and handguns, into the bed of the Chevrolet pick-up truck. Interior video showed one subject proceed to the area for the restricted weapons, which are positioned high on a wall. A second subject shattered glass display cases by jumping on top of them, and the third subject shattered glass cases by using the buttstock of a rifle. The three individuals then entered the truck and fled the scene. The burglary alarm was activated at 1:15 AM. St. Tammany Parish Sheriff's Office ("STSO") arrived at 1:20 AM and the suspects were gone by the time they arrived.

It was later determined that forty-five total weapons were stolen from the store. Forty of these weapons were classified as non-restricted weapons and five were restricted weapons. All the stolen weapons shipped and traveled in interstate commerce or foreign commerce. Specifically, the weapons were all manufactured outside of the state of Louisiana, and therefore, traveled in interstate commerce prior to being stolen from C&S Gun Parlor on April 17, 2020.

On April 18, 2020, at approximately 11:17 PM, NOPD located a gray Chevrolet Silverado, LA license plate [REDACTED], parked along a fence at the Norfolk Southern Railroad in the 2200 block of St. Ferdinand Street in New Orleans, LA. The NOPD officer ran the license plate and discovered the vehicle was reported stolen on April 16, 2020. NOPD notified G.H. who responded to the scene and identified his vehicle. G.H. indicated that his vehicle had sustained rear-end damage and damage to the top of the truck bed. G.H. advised that the vehicle was not damaged prior to it being stolen.

On May 1, 2020, investigators executed a search warrant at the residence of **WILLIAMS'** mother, located at [REDACTED] New Orleans, LA. Officers located several items during the search of the residence including a .40 caliber Glock handgun magazine, a Chevrolet key fob, a black backpack, a .308 caliber rifle magazine, a box of .380 caliber Sig Sauer ammunition, and black and orange gloves, all located inside the residence. Additionally, officers located a Century Arms .308 caliber rifle, serial number ICL00783, in the side yard of the residence. This restricted firearm was reported stolen from C&S Gun Parlor on April 17, 2020.

WILLIAMS also admits that on May 19, 2020, the evening before his arrest, he and K.E. were driving in a stolen Ford F-150 and participated in a carjacking in the 7600 block of Trapier Street in New Orleans, LA. **WILLIAMS** and K.E. intentionally took a 2020 gray Nissan Altima (Florida license plate [REDACTED]), a vehicle that had been transported, shipped, and received in interstate commerce, from C.S. by force, violence, and intimidation, with the intent to cause death and serious bodily harm. Finally, **WILLIAMS** worked with K.E. to plan and to execute the carjacking.

The victim, C.S., reported the crime to NOPD and indicated that he was sitting in his vehicle outside of his relative's residence when he observed a white Ford F-150 stop in the middle of the street in front of the residence. After the F-150 stopped, an unknown male, armed with a firearm, exited the vehicle, and approached C.S. The individual commanded C.S. to exit the vehicle and turn over his phone. During this time, a second perpetrator exited the F-150 and approached C.S. with a firearm and ordered him to lay on the ground. C.S. complied with their orders and laid on the ground. The first subject entered C.S.'s vehicle, a Nissan Altima, and fled the scene. The second subject went back into the F-150 and fled the scene. C.S. provided officers with a description of his cell phone (light blue iPhone with clear case) and a description of the

vehicle, which was a rental vehicle.

On May 20, 2020, at approximately 5:27 AM, the Jefferson Parish Sheriff's Office ("JPSO") dispatched deputies to the area of Manhattan Blvd. & Westbank Expressway in search of a stolen white Ford F-150 (LA license plate [REDACTED]). Officers observed the vehicle traveling southbound on Maplewood Drive driven by a person later identified as **WILLIAMS**. Deputies attempted to stop the vehicle; however, **WILLIAMS** continued to accelerate, disregard several stop signs, and continue to travel at a high rate of speed before he lost control of the vehicle and crashed in a ditch. Following the crash, he exited through the front door of the driver side and fled on foot. The officers observed **WILLIAMS** flee the scene, again disregarding commands to stop. Officers lost a visual of **WILLIAMS** and set up a perimeter around Redwood Drive in Gretna, LA.

JPSO was able to locate **WILLIAMS** later that morning at 5:44 AM at [REDACTED] Gretna, LA. **WILLIAMS** was located inside of the residence and officers identified him as the same individual who crashed the F-150 and fled. **WILLIAMS** also admits that he was driving a stolen Ford F-150 when JPSO attempted to stop him. He fled from deputies while driving the stolen vehicle and eventually crashed the vehicle. **WILLIAMS** admits that he exited the vehicle and fled on foot, leaving clothing and a firearm. He then ran into the rear entrance of [REDACTED]


[REDACTED] JPSO later apprehended **WILLIAMS** inside the residence located at [REDACTED] Following his arrest and advisement of his *Miranda* rights, **WILLIAMS** spoke with investigators and told them the location where he dropped clothing and other items during his chase with JPSO. He also admitted his participation in the aforementioned carjacking and burglary on April 16-17, 2020, as well as the carjacking on May 19, 2020. **WILLIAMS** also advised investigators on that morning that there was a firearm inside of the Ford F-150.

On May 20, 2020, NOPD executed a search warrant at the residence of **WILLIAMS'** father, located at [REDACTED] Gretna, LA. Investigators located two firearms which were reported stolen from C&S Gun Parlor on April 17, 2020, including a silver and black Taurus Int'l MFG .44 Magnum revolver, serial number LN396516, and a silver Limited Pro Defiant IF-G 9MM pistol, serial number FG00499. Investigators also located 14 live rounds of Luger RP 9mm ammunition, 47 live rounds of .44 caliber Red Mag ammunition, 6 live rounds of .380 caliber Auto ammunition, and 10 live rounds of IMI16 5.56 caliber ammunition. Finally, investigators located 1 black sweatshirt with a "Pac-Man" design, 1 pair of jeans with a green belt, and 1 pair of black Nike Jordan tennis shoes.

On May 20, 2020, investigators also executed a search warrant on the white Ford F-150 investigators observed **WILLIAMS** driving. During the search of the vehicle, investigators located a black 9mm magazine, 15 live rounds of 9mm ammunition, a T-Mobile Hotspot Wi-Fi Device, a blue Motorola Cell Phone, a black Samsung cell phone, a red Apple iPhone, identified as **WILLIAMS'** phone, and a light blue Apple iPhone, identified as C.S.'s iPhone, and a Louisiana identification card for "Kahliq Williams". Following **WILLIAMS'** statement, officers conducted a secondary search of the vehicle and located a black Taurus G3 9mm semi-automatic pistol, SN#ABB288466, on the floorboard beneath the driver's seat. This firearm was reported stolen from C&S Gun Parlor on April 17, 2020.

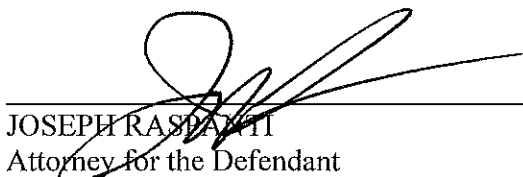
LIMITED NATURE OF FACTUAL BASIS

This proffer of evidence is not intended to constitute a complete statement of all facts known by **KAHLIQ WILLIAMS** and by 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 **KAHLIQ WILLIAMS'** plea of guilty to the charged offenses.



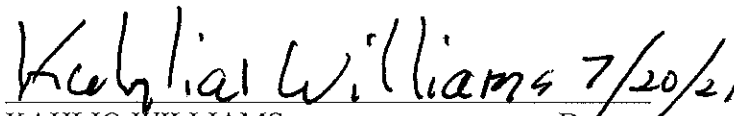
INGA PETROVICH
Assistant United States Attorney

7/20/2021
Date



JOSEPH RASANTTI
Attorney for the Defendant

7/20/21
Date



KAHLIQ WILLIAMS
Defendant

Date