

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 19-216</b>
<b>v.</b>	*	<b>SECTION: "M"</b>
<b>WILSON ROMERO</b>	*	
	*	
	*	
	*	

**FACTUAL BASIS**

The above-named defendant, **WILSON ROMERO** has agreed to plead guilty to Count 1 of the Indictment in which he is charged with possession with the intent to distribute 100 grams or more of heroin. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts, among others, to support the allegations of Count 1 against defendant **WILSON ROMERO ("ROMERO")**:

On May 6, 2019, a Louisiana State Police ("LSP") trooper was on patrol in St. John the Baptist Parish. The trooper observed a maroon 2006 Toyota Scion bearing Texas license plate [REDACTED] (the "Scion") traveling eastbound on I-10 near mile marker 197. The Scion was following the car in front of it too closely, in violation of Louisiana R.S. 32:81A, and the trooper conducted a stop. As the trooper approached the vehicle, he observed that **ROMERO** was the driver and sole occupant of the vehicle. The trooper ordered **ROMERO** to get out of his car, and **ROMERO** complied. The trooper asked **ROMERO** questions about where **ROMERO** was going, and **ROMERO** gave inconsistent answers and appeared nervous. At one point he said that he was on his way to see his cousin, and at another point he said he was going to see his friend. He was unable to provide the name of his friend/cousin. He was asked for the paperwork to the

Page 1 of 3

Scion, but provided only a document related to a house cleaning company, and was unable to explain why.

The trooper asked **ROMERO** for consent to search the Scion, and **ROMERO** gave both written and verbal consent to search. The trooper searched the vehicle and recovered a Shop-Vac style vacuum cleaner in the rear cargo area of the Scion. Upon opening the lid to the vacuum cleaner, the trooper recovered what appeared to be approximately one kilogram of heroin wrapped in duct tape. **ROMERO** was then placed under arrest and was provided with Miranda warnings. **ROMERO** said that the vacuum cleaner was his, but that the package was not. The heroin was later sent to the Jefferson Parish Sheriff's Office laboratory, which confirmed the presence of heroin and a net weight of 994 grams.


After his arrest, Special Agents from the FBI conducted an interview with **ROMERO** at LSP's Troop B in Kenner, Louisiana. During that interview, **ROMERO** admitted that he had received the heroin from a drug trafficker in Houston, and that **ROMERO** paid \$32,000 for the heroin. **ROMERO** also stated that he intended to provide the heroin to another individual in New Orleans for \$44,000.

This proffer of evidence is not intended to constitute a complete statement of all facts known by **ROMERO**, 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 and factual basis for **ROMERO's** plea of guilty to these crimes.

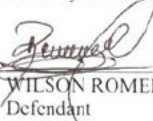
**READ AND APPROVED:**

  
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JONATHAN L. SHIH  
MARIA M. CARBONI  
Assistant United States Attorneys

9/27/21  
(Date)

  
\_\_\_\_\_  
Ernest J. Bauer Jr.  
Attorney for Defendant

9-27-2021  
(Date)

  
\_\_\_\_\_  
WILSON ROMERO  
Defendant

9-18-2021  
(Date)