

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-118
v. * SECTION: "H"
NAVORIOUS HILLS *
* * *


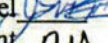
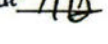
FACTUAL BASIS

The defendant, **Navorious HILLS** ("HILLS") has agreed to plead guilty to Count 2 of the indictment now pending, Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the indictment filed against the defendant:

On May 15, 2020, **HILLS** met D.B. near the Manchac Public Boat Launch within the territorial boundary of the Eastern District of Louisiana. The purpose of the meeting was to sell D.B. prescription Oxycodone ("Oxy") pills, a Schedule II Controlled Substance. **HILLS** had been selling Oxy to D.B. for several months. On this occasion, **HILLS** sold D.B. ten (10) Oxy pills in exchange for a total of \$400.00. That amount of money included \$200.00 that was owed by D.B. for a previous transaction.

After the transaction had concluded, **HILLS** and D.B. began arguing. During the drug deal, D.B. had remained sitting in his pickup truck with the window rolled down while **HILLS** was sitting on a motorcycle parked along the side of the truck. At some point, D.B. started to exit the


AUSA 
Defense Counsel 
Defendant 

truck and knocked over **HILLS'** motorcycle with his truck door. The conflict escalated and **HILLS** pulled his Glock 43 semi-automatic handgun bearing serial number "BEMC857" and shot D.B. in the chest.

HILLS called 9-1-1 and attempted to render aid to D.B. while waiting for first responders. **HILLS** remained at the scene until law enforcement and EMS arrived. **HILLS** voluntarily surrendered and gave a statement admitting that he sold Oxy to D.B. and admitted to shooting him in the chest after the drug deal when D.B. knocked over **HILLS'** motorcycle and the conflict escalated.

HILLS carried the firearm on his person for the purpose of defending his illegal narcotics activity and his intent to possess it was in furtherance of drug trafficking.

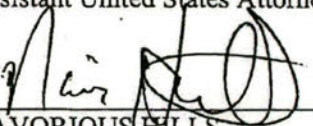
The firearm used was traced by the Bureau of Alcohol, Tobacco, Firearms and Explosives. It was identified positively as a Glock 43 semi-automatic pistol registered to **HILLS**. The firearm was not manufactured in Louisiana and travelled in interstate commerce.



CHARLES D. STRAUSS
Assistant United States Attorney

11/18/2021

Date



NAVORIOUS HILLS
Defendant

11/5/21

Date



JAMES L. MOFFETT, III
Attorney for Defendant

11/14/21

Date