

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

*

CRIMINAL NO. 19-174

v.

*

SECTION: "R"

PALMA JEFFERSON, SR.

*

* * *

FACTUAL BASIS

The defendant, PALMA JEFFERSON, SR., ("JEFFERSON"), will plead guilty to the one-count superseding bill of information charging him with possession of a firearm while being an unlawful user of or addicted to any controlled substance, in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

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 now pending against the defendant. All the below facts occurred in the Eastern District of Louisiana.

On April 29, 2019, Jefferson Parish Sheriff's Office ("JPSO") detectives and members of the New Orleans Gang Taskforce conducted an investigation of Palma Jefferson, Jr. (JEFFERSON's son) in connection with illicit narcotics activities arising out of [REDACTED] Metairie, Louisiana. During that investigation, on April 30, 2019, JEFFERSON arrived on scene [REDACTED] in Metairie. Detectives conducted an investigatory stop of JEFFERSON'S vehicle in the [REDACTED] [REDACTED] [REDACTED] parking lot. JEFFERSON advised detectives that he did not have any firearms in the car, and he gave verbal

AUSA MAP
Defendant
Defense Counsel PTK

consent to detectives to search his car. In the center console, detectives found a fully loaded Amadeo Rossi, .38 caliber revolver, bearing serial number W046941. A query of the firearm revealed that it was stolen out of Jefferson Parish on July 17, 2017 and documented under JPSO Item Number G-15165-17. Agents then advised **JEFFERSON** of his Miranda rights.

In the driver's door handle, detectives recovered two pieces of cocaine, weighing 0.6 grams. Investigators also recovered two cell phones from inside the vehicle.

JEFFERSON told detectives that he owns the firearm, and he forgot that it was in his car. **JEFFERSON** said that he purchased the firearm on the street. **JEFFERSON** also stated that he was a cocaine abuser, and the cocaine in the vehicle belonged to him.

Before **JEFFERSON** possessed the firearm on April 30, 2019, he was arrested and convicted of previous drug-related charges, which demonstrate **JEFFERSON**'s narcotics addiction, for a substantial period of time. Specifically, on December 11, 1997, **JEFFERSON** was convicted in Orleans Parish Criminal District Court case number 385-637, "A," for possession of a controlled dangerous substance within 1,000 feet of a school and a multiple bill. He was sentenced to ten years at the Louisiana Department of Corrections for that conviction. On January 12, 1994, **JEFFERSON** was also convicted in Orleans Parish Criminal District Court case number 363-449, "G," for simple possession of cocaine. He was sentenced to three years, one month, and twelve days at the Louisiana Department of Corrections for that conviction. Additionally, on April 23, 1993, **JEFFERSON** was arrested in Orleans Parish Criminal District Court magistrate number 268-768, for possession of cocaine and misdemeanor possession of drug paraphernalia. The disposition of that arrest is unavailable. Further, on January 11, 1990, **JEFFERSON** was arrested and later convicted in Orleans Parish Criminal District Court for possession with the intent to distribute cocaine. He was sentenced to five years at the Louisiana Department of Corrections

for that conviction. Finally, on August 7, 1989, **JEFFERSON** was arrested in Orleans Parish Criminal District Court magistrate number 214-838 for possession with the intent to distribute cocaine. That charge was refused by the Orleans Parish District Attorney's Office on November 17, 1989. These arrests and convictions serve as evidence of **JEFFERSON'S** continuous narcotics addiction problem, specifically to cocaine.

Finally, if this matter were to have gone to trial, the government would call Alcohol, Tobacco, Firearms, and Explosives Special Agent [REDACTED], who would testify that he examined the firearm that **JEFFERSON** possessed on April 30, 2019. Specifically, he would testify that the firearm, a fully loaded Amadeo Rossi, .38 caliber revolver, bearing serial number W046941, was manufactured by Amadeo Rossi S.A. in Brazil and imported into the United States by Interarms through the State of Virginia. Thus, it affected both foreign and interstate commerce before **JEFFERSON** possessed it in the Eastern District of Louisiana on April 30, 2019, as defined in Title 18, United States Code, Section 921(a)(2).

LIMITED NATURE OF FACTUAL BASIS

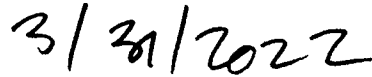
This proffer of evidence is not intended to constitute a complete statement of all facts known by **PALMA JEFFERSON, SR.** and by the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose

of this proffer is to demonstrate that there exists a sufficient legal basis for JEFFERSON's plea of guilty to the charged offense.

READ AND APPROVED:



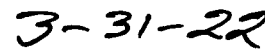
MELISSA E. BÜCHER
Assistant United States Attorney



Date



PALMA JEFFERSON, SR.
Defendant



Date



ROMA KENT
Attorney for Defendant



Date