

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 21-087
v. * SECTION: "E"
JOSEPH WOODS *
* * *

FACTUAL BASIS

The defendant, **JOSEPH WOODS** ("**WOODS**"), has agreed to plead guilty as charged to the pending indictment, which includes: Count 1, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Count 2, 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); and Count 3, possession of a firearm by a convicted felon in violation of Title 18, United States Code, Sections 922(g)(1) 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:

On October 4, 2020, Westwego Police Department Officers attempted to stop a car going 48 MPH in a 35 MPH zone. They turned on the lights and sirens of their marked unit. The suspect car continued to drive forward and eventually came to a stop on the side of the road.

When officers approached, **WOODS** was in the passenger seat and his co-defendant, **ANTHONY PITTMAN** ("**PITTMAN**"), was in the driver seat. **WOODS** had a camouflage bag strapped to his chest and a second camouflage bag at his feet. While **WOODS** was attempting to pull his identification out of his pocket, a handgun fell from his pants onto the floorboard. Upon

AUSA CMS
Defendant SW
Defense Counsel RJA

seeing this occur, **PITTMAN** immediately pressed the gas pedal and began travelling at a high rate of speed leaving the officers on the roadside.

The officers got back in their car and pursued **PITTMAN** and **WOODS**. Eventually, **PITTMAN** lost control and crashed into the police unit, bringing his car to a stop. **PITTMAN** stayed in the car and **WOODS** attempted to flee on foot.

WOODS was eventually apprehended. During the foot chase, he discarded the two camouflage bags in some bushes. Officers recovered the bags where they saw him throw them. A search of the bags revealed the following: one black Springfield Arms 9mm handgun bearing serial number GM960121, loaded with 13 rounds; one clear bag with one gram of heroin; three clear bags containing white powder containing 19.5 grams of cocaine; one clear bag containing cocaine base; ten Tramadol 200MG pills; two digital scales with powder substance on them; and multiple empty plastic baggies.


The recovered 9mm Springfield Arms handgun had been reported stolen. In addition to searching the camouflage bags, officers searched the car where **WOODS** was a passenger. A Glock 22 .40 caliber handgun bearing serial number AANU745 was found under the passenger seat. In the center console, there was \$2,455.00 in mixed denominations, a digital scale with an unknown powder residue, and clear plastic baggies. These items are evidence of trafficking in narcotics. **WOODS** acknowledges his possession of the controlled substances described herein was with the intent to distribute them. He further acknowledges the purpose of having the firearms was in furtherance of drug trafficking.

Prior to the events described above, **WOODS** knew he had been convicted of felony offenses. Specifically, he had convictions on September 28, 2011, in the 24th Judicial District Court of Louisiana, Case No. 11-01121 "D," for possession with intent to distribute cocaine in violation

of LA R.S. 40:967(A); August 2, 2012, in the 24th Judicial District Court of Louisiana, Case No. 11-04650 "C," for possession with intent to distribute cocaine in violation of LA R.S. 40:967(A); August 20, 2013 in the 24th Judicial District Court of Louisiana, Case No. 10-05980 "J," for possession of a controlled dangerous substance, cocaine, in violation of LA R.S. 40:967(C) and Case No. 10-05981 "J," for illegal carrying of weapons in violation of LA R.S. 14:95; and February 7, 2019 in the 24th Judicial District Court of Louisiana, Case No. 18-01187 "P," for possession of a controlled dangerous substance in violation of LA R.S. 40:969(C).

Springfield Arms and Glock do not manufacture firearms in the state of Louisiana. Both firearms travelled in interstate commerce prior to coming into **WOODS'** possession.

This Factual Basis is not intended to constitute a complete statement of all facts, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea.



CHARLES D. STRAUSS
Assistant United States Attorney

6/16/22


Date



JOSEPH WOODS
Defendant

6-16-22

Date



R. JUDSON MITCHELL
Attorney for Defendant

6/16/22

Date