

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

UNITED STATES OF AMERICA

v.

Case Number 3:18cr3/RV

KAISHAWNDRA G. LYONS
_____ /

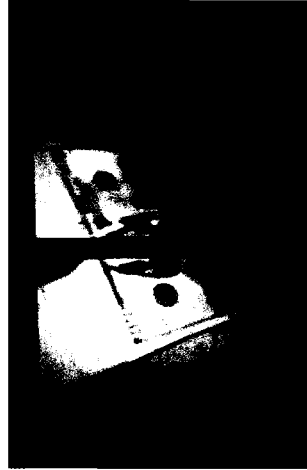
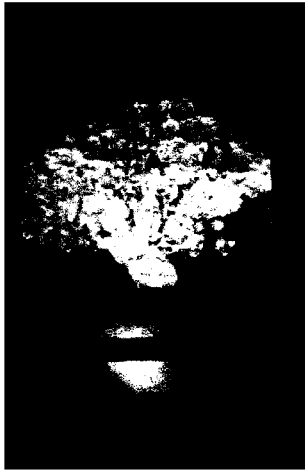
FACTUAL BASIS FOR GUILTY PLEA

The defendant admits that if this case were to proceed to trial, the government could prove the following facts.

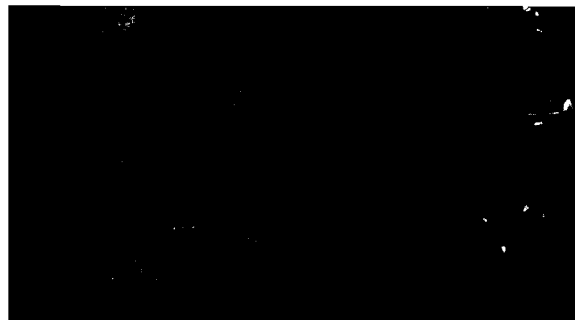
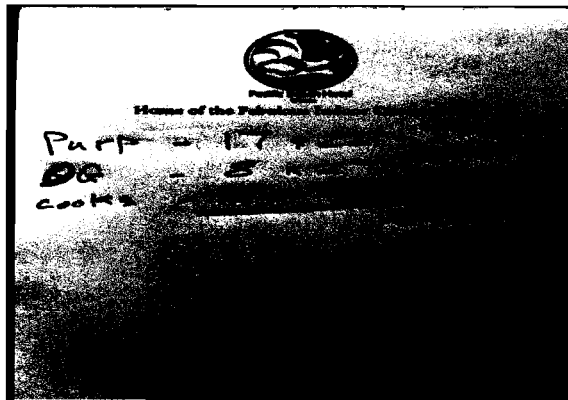
Federal and local law enforcement agencies have been investigating a multi-state drug trafficking and money laundering organization operating in Florida, California, and elsewhere. The Florida subjects of the investigation are “The Booker Brothers.” The Booker Brothers created a gang known as the Young Check Chasers (“YCC”).

Beginning in 2016, law enforcement viewed a portion of a social media account connected to username “ycc12,” which revealed The Booker Brothers’ faces, jewelry, vehicles and their known locations. With the consistent images/videos of drugs, large amounts of currency and guns, law enforcement began preparing federal electronic search warrants to further the investigation. As confirmed below, law enforcement was aware of instances wherein the account

“ycc12” posted pictures related to marijuana and large amounts of United States currency that derived from illicit narcotics sales. These examples were posted in August 2016:



On November 17, 2016, law enforcement obtained a federal search warrant for the account utilizing the username “ycc12.” As a result of said search warrant, law enforcement was able to identify the user of account “wii_win” as a source of kilogram quantities of drugs to The Booker Brothers. Per the initial “ycc12” search warrant, it was revealed that “wii_win” was sending several pounds of marijuana at one time from California to Pensacola, Florida. The IRS observed numerous “owe sheets” sent to the “ycc12” account by “wii_win” coupled with photographs of packages and marijuana being shipped. Please see below images sent from “wii_win” to “ycc12,” respectively, on August 9, 2016, and September 14, 2016:



“Purp,” “Cooks,” and “OG” are terms that refer to different types of marijuana. In essence, “wii_win” and “ycc12” communicated via social media regarding illicit financial transactions, narcotics, and shipment details.

On December 7, 2016, law enforcement obtained a federal search warrant for the “wii_win” account. Said account contents confirmed illicitly based communications continued between “wii_win” and “ycc12.” Contents of the “wii_win” account also included images and videos that confirmed the identity of the user. Using this information, along with the subscriber data and financial records, law enforcement was able to positively identify the account user as co-defendant Uy Nguyen.

Records and information obtained from Bank of America revealed that Uy Nguyen opened an account at a banking center located in Fairfield, California. The records show that, during the conspiracy, Uy Nguyen's one account received cash deposits totaling approximately \$100,000. Bank records show that Joseph Booker, Aaron Booker, and defendant Kaishawndra Lyons ("Lyons") made a portion of these illicit deposits to launder drug proceeds on multiple occasions. Indeed, the defendant was responsible for tens of thousands of dollars in United States currency being funneled through out of state bank accounts to further the instant conspiracy.

On November 1, 2016, Lyons was encountered in a non-custodial setting by two IRS agents. She was getting out of her Porsche Cayenne and about to enter her residence. The IRS agents identified themselves, and Lyons consented to an interview on the front porch of the residence. When confronted with the above noted illicit cash deposits, Lyons told agents that she was "doing more hair" than she anticipated. IRS agents then affirmatively advised Lyons regarding false statements pursuant to Title 18, United States Code, Section 1001. Thereafter, Lyons reiterated the money was coming from "doing hair" and "sewing and braiding." When confronted with the fact that all the cash was being deposited into the names of other persons in another state, Lyons stated that she "was starting a business" and these were her "business partners." Her statements were patently false, and they are easily disproven based upon the (lack of) tax returns IRS

maintains for Lyons – moreover, the accounts she deposited money into link to co-defendant Nguyen and his family members (who were not running a “hair” business) in California.

During the month of January 2017, law enforcement executed another federal search warrant on the “wii_win” account. As a result of this search warrant, the IRS identified another “owe sheet” that had been sent from “wii_win” to the “ycc12” account that post-dated previous search warrant results. On or about February 28, 2017, law enforcement executed another federal search warrant on the “wii_win” account. As a result of this search warrant, law enforcement identified yet another “owe sheet” that was sent from “wii_win” to the “ycc12” account that post-dated previous search warrant results.

Postal records show that over two dozen packages were mailed from Pensacola, Florida, to addresses associated with co-defendant Uy Nguyen. This would be the United States currency sent back to the co-defendant after the shipment of marijuana and cocaine to his conspirators, The Booker Brothers. The USPIS was able to obtain surveillance footage of multiple recent transactions that occurred at post offices in Pensacola, Florida, which are equipped with functioning security cameras. These images/videos show defendant Lyons mailing some of the currency filled packages to further the conspiracy charged (see sample image below).



On or about December 5, 2017, the USPIS intercepted a package that was mailed from Pensacola, Florida, to co-defendant Nguyen. Law enforcement obtained a federal search warrant for the package. A search of the package revealed approximately \$16,870 of United States currency. A review of the box itself revealed the sender/recipient addresses almost perfectly matched a package that defendant Lyons mailed on October 23, 2017. A fingerprint expert from the USPIS was able to lift fingerprints off said currency package that linked to directly Aaron and Joseph Booker.

In mid-December 2017, a criminal complaint was obtained in the Northern District of Florida for Uy Nguyen. Also obtained were search warrants for his residence, and the residence of Lyons/Bookers in Pensacola. On December 19, 2017, all of these warrants were executed. Inside the residence of co-defendant Nguyen, law enforcement located kilograms of marijuana.

When law enforcement executed the search warrant at the Lyons/Booker residence, defendant Aaron Booker was present. In total, the IRS seized over \$300,000 in United States currency and over \$300,000 in assets such as diamonds/jewelry and high end clothes from said residence. A forensic review of the cellular device seized in the residence linked to defendant Aaron Booker revealed a wealth of inculpatory evidence (he was actually logged into the “ycc12” account).¹ This included owes sheets as well as mailing information related to the defendants. The defendant now concedes she conspired with others noted in the superseding indictment to jointly launder tens of thousands of dollars through bank accounts and jewelry stores between Florida, California and elsewhere. Moreover, she concedes to knowingly providing false statements to the IRS agents who interviewed her during the course of this conspiracy as noted above.

Elements of the Offense

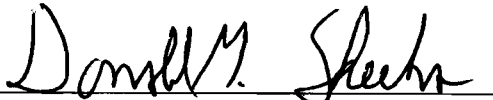
Count Two: The defendant can be found guilty only if all the following facts are proved beyond a reasonable doubt. First, two or more people agreed to try to accomplish a common and unlawful plan to launder drug proceeds through the interstate transfer of illicit United States currency. Second, the defendant knew about the plan’s unlawful purposed and voluntarily joined it.

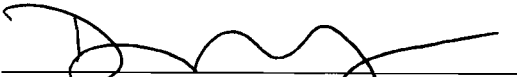
Count Three: The defendant can be found guilty only if all the following facts are proved beyond a reasonable doubt. First, the defendant made the statement(s) as charged. Second, the statements were false. Third, the falsity concerned a material matter such as where the laundered funds derived from. Fourth, the

¹ Of note, co-defendant Joseph Booker also operated the social media account “cashin_in1000” that also provided inculpatory evidence relating him to the instant conspiracy.

defendant acted willfully, knowing that the statements were false. Fifth, the false statements were made within a matter of the jurisdiction of a department or agency of the United States.

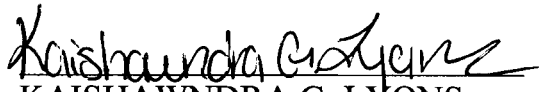
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5/2/18
Date

5/7/18
Date


KAISHAWNDRA G. LYONS
Defendant

5/2/18
Date