

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

UNITED STATES OF AMERICA

v.

Case Number 3:18cr3/RV

JOSEPH F. BOOKER, JR.
_____ /

FACTUAL BASIS FOR GUILTY PLEA

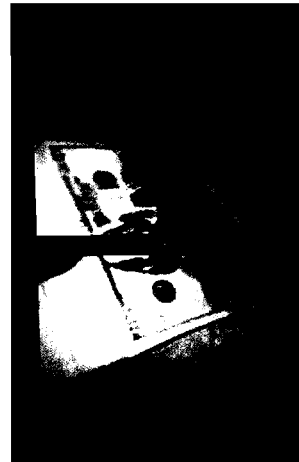
The defendant admits that if this case were to proceed to trial, the government could prove the following facts.

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

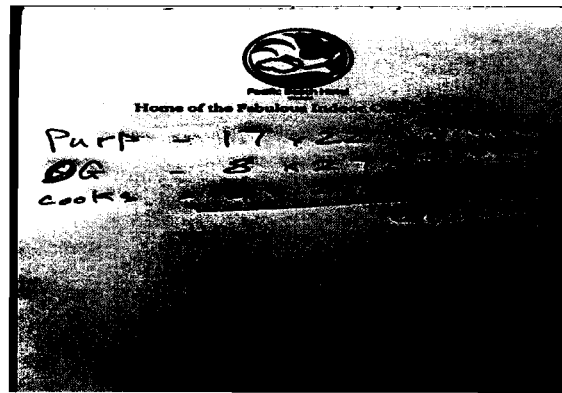
A handwritten signature in black ink, appearing to be "RJ" followed by a flourish and the number "16".

“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:



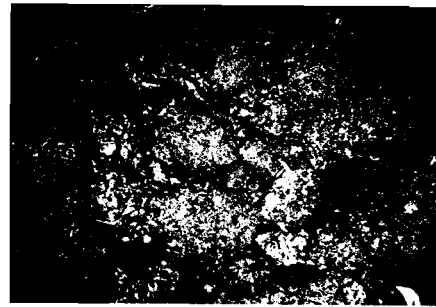
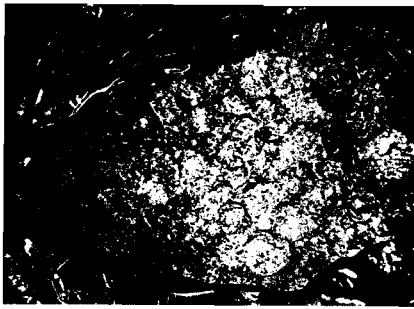
On November 17, 2016, law enforcement obtained a federal search warrant for the account utilizing the username “ycc12.” As a result of said search warrant, law enforcement was able to identify the user of account “wii_win” as a source of kilogram quantities of drugs to The Booker Brothers. Per the initial “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:

Handwritten signature



“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.” For example, below are two images that were sent to “ycc12” on or about November 26, 2016, and December 2, 2016, respectively, by “wii_win”:



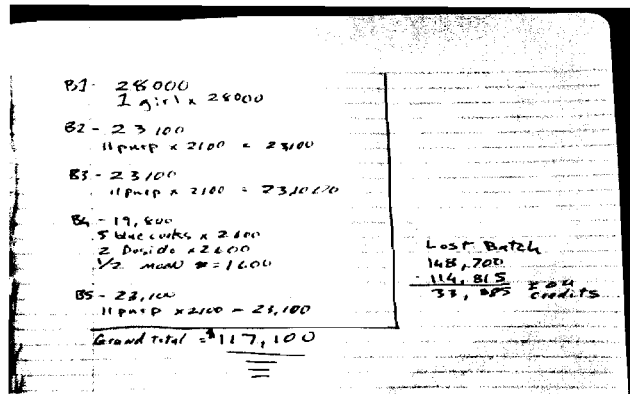
Contents of the “wii_win” account also included images and videos that confirmed the identity of the user. Using this information, along with the subscriber data and financial records, law enforcement was able to positively identify the account user as co-defendant Uy Nguyen.

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 Kaishawndra Lyons (“Lyons”) made a portion of these illicit deposits to launder drug proceeds.

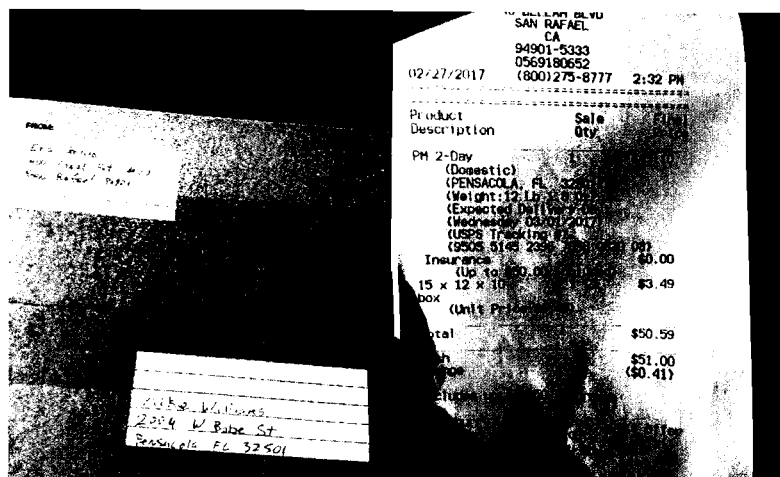
During the month of January 2017, law enforcement executed another federal search warrant on the “wii_win” account. As a result of this search warrant, the IRS identified another “owe sheet” that had been sent from “wii_win” to the “ycc12” account that post-dated previous search warrant results. On or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

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“owe sheet” that was sent from “wii_win” to the “ycc12” account that post-dated previous search warrant results (see below image sent by “wii_win” to “ycc12” on February 24, 2017).



One of the terms listed on the above “owe sheet” that was not previously discussed was “girl.” Law enforcement knows that “girl” is a street term commonly used to refer to cocaine. Law enforcement further knows that \$28,000 is consistent with a kilogram quantity of cocaine. Moreover, on or about February 27, 2017, the following images were sent from “wii_win” to “ycc12”:



This box shipment had a very particular address for the sender as well as the receiver. Thereafter, on or about April 27, 2017, the USPS intercepted a different suspicious package that was mailed from the San Rafael, California, Main Post Office to the same address in Pensacola. Law enforcement obtained a federal search warrant for the package. A search of the package revealed two kilograms of cocaine. A review of the box itself revealed the sender/recipient addresses almost perfectly matched the image of the package pictured above, which was obtained through the search warrant executed on February 27, 2017, on the “wii_win” account. Thusly, law enforcement confirmed the actual physical shipment of cocaine related to “wii_win” and “ycc12” during the last week in April 2017.

On May 2, 2017, law enforcement obtained another federal search warrant for the “wii_win” account. As a result of this search warrant, law enforcement identified another “owe sheet” that had been sent from “wii_win” to the “ycc12” account on or about April 11, 2017. This “owe sheet” contained values owed for both cocaine and marijuana during the course of the instant conspiracy.

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 USPS was able to obtain surveillance footage of multiple recent transactions that occurred at

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post offices in Pensacola, Florida, which are equipped with functioning security cameras. These images/videos show co-defendant Kaishawndra Lyons mailing the currency filled packages.

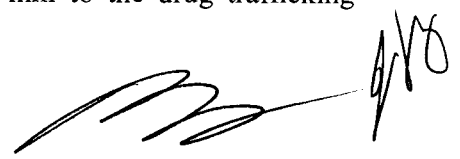
On or about December 5, 2017, the USPS intercepted a package that was mailed from Pensacola, Florida, to co-defendant Nguyen. Law enforcement obtained a federal search warrant for the package. A search of the package revealed approximately \$16,870 of United States currency. A review of the box itself revealed the sender/recipient addresses almost perfectly matched a package that co-defendant Lyons mailed on October 23, 2017. A fingerprint expert from the USPS 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. Law enforcement also located, in plain view in his vehicle, a receipt for a newly mailed parcel heading to Pensacola, Florida. The USPS was then on the lookout for that parcel coming to Pensacola.

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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. One of the images depicting mailing information was actually the above noted receipt located in co-defendant Nguyen’s vehicle upon arrest. That is, the actual receipt from the co-defendant in California was an image in the cellular device of co-defendant Aaron Booker. Said parcel was intercepted in Pensacola, a federal search warrant was obtained, and over 10 pounds of marijuana was located inside. Based upon the “owe sheets,” the parties agree this conspiracy involving the defendant exceeded 5 kilograms of cocaine and 250 kilograms of marijuana, and that tens of thousands of dollars was jointly laundered through bank accounts and jewelry stores between Florida, California and elsewhere.

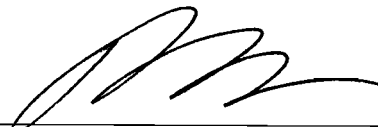
¹ Of note, the defendant also operated the social media account “cashin_in1000” that also provided inculpatory evidence relating him to the instant conspiracy. The defendant’s Instagram social media account provided significant amounts of evidence linking him to the drug trafficking business as well.

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Elements of the Offense


Count One: The defendant can be found guilty only if all the following facts are proved beyond a reasonable doubt. First, two or more people in some way agreed to try to accomplish a shared and unlawful plan to distribute cocaine and marijuana. Second, the defendant knew the unlawful purpose of the plan and willfully joined in it. Third, the object of the unlawful plan was to distribute more than five kilograms of cocaine and more than one hundred kilograms of marijuana.

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.



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Defendant

5/1/18
Date