

United States Court of Appeals
For the Eighth Circuit

No. 25-1751

United States of America

Plaintiff - Appellee

v.

Trajuan Laroy West

Defendant - Appellant

Appeal from United States District Court
for the Northern District of Iowa - Eastern

Submitted: May 11, 2026
Filed: September 3, 2026
[Unpublished]

Before L.R. SMITH, BENTON, and STRAS, Circuit Judges.

PER CURIAM.

The combination of drugs and a gun led to a 112-month prison sentence for Trajuan West. Although he challenges his conviction and two enhancements, we affirm.

I.

During a traffic stop, an officer smelled marijuana and spotted several smoked joints in the ashtray. A full search uncovered a baggie with 10 grams of marijuana and a loaded pistol. To shift the blame, West texted his girlfriend and instructed her to say the items belonged to her. Sure enough, when he called her later that day during a police interview, she claimed to have left her gun in the car, only to retract the statement four months later.

West conditionally pleaded guilty to illegally possessing the firearm based on convictions for “a crime punishable by imprisonment for a term exceeding one year” and “a misdemeanor crime of domestic violence.” 18 U.S.C. § 922(g)(1), (9). In his plea agreement, he reserved the right to challenge each statute’s facial constitutionality under the Second Amendment.¹

At sentencing, the district court² applied two enhancements, one for “willfully obstruct[ing] or imped[ing], or attempt[ing] to obstruct or impede, the administration of justice with respect to the investigation [and] prosecution” of the case, U.S.S.G. § 3C1.1 (adding two offense levels), and another for possessing the pistol “in connection with” the distribution of drugs, *id.* § 2K2.1(b)(6)(B) (2024) (adding four). We review the interpretation and application of the Sentencing Guidelines de novo, but any underlying factual findings for clear error. *See United States v. Feeback*, 53 F.4th 1132, 1134 (8th Cir. 2022).

¹The challenge may have survived the guilty plea, but circuit precedent forecloses it. *See United States v. Cunningham*, 114 F.4th 671, 675 (8th Cir. 2024) (ruling out facial challenges to § 922(g)(1)); *United States v. Bernard*, 136 F.4th 762, 766 (8th Cir. 2025) (doing the same for § 922(g)(9)).

²The Honorable C.J. Williams, Chief Judge, United States District Court for the Northern District of Iowa.

II.

West’s attempt to shift the blame by urging his girlfriend to lie was, as the district court concluded, an effort to “impede . . . the investigation.” U.S.S.G. § 3C1.1. It may not have had the effect he intended, but the obstructive conduct itself is what triggered the enhancement. *See id.*; *United States v. Edwards*, 820 F.3d 362, 365 (8th Cir. 2016) (affirming an enhancement “when a defendant tried to obstruct justice” by asking a potential witness to lie “but the government suffered no prejudice”). As the court put it, West crossed the line once he “recruited *another person* . . . to [help] derail the investigation.” (Emphasis added); *see United States v. Porter*, 140 F.4th 997, 1001 (8th Cir. 2025) (holding that the enhancement applied once a defendant “tr[ie]d to have [an acquaintance] claim the gun” underlying the charge); *Edwards*, 820 F.3d at 364–66 (reaching the same conclusion when a defendant “asked [his brother] to provide an alibi and a [cover] story”).

Once it was clear the gun belonged to him, West’s history of drug dealing brought a second enhancement into play for possessing it “in connection with another felony offense.” U.S.S.G. § 2K2.1(b)(6)(B) (2024). Factual support came from multiple prior marijuana convictions and evidence that, just days before the traffic stop, he repeatedly texted someone about supplying “weed.” From this evidence, “a reasonable factfinder” could conclude that there was a connection between his drug dealing and the gun, *United States v. Brockman*, 924 F.3d 988, 992–93 (8th Cir. 2019), even if the amount found in the car could have been either “a user quantity” or a “distribution amount.” *See United States v. Swanson*, 610 F.3d 1005, 1008 (8th Cir. 2010) (explaining that “the defendant must possess the gun with the purpose or effect of facilitating the drug possession,” which can happen when he “concurrently possesses drugs and a firearm while in public, like in a car”).

III.

We accordingly affirm the judgment of the district court.