

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL NO: 09-391

v.

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SECTION: "K"

**DEWAYNE COOPER
a/k/a "Ross"**

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FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

In the beginning of 2009, agents of the Drug Enforcement Administration (DEA) began an investigation into the drug trafficking activities of WILLIAM STEVENSON and others in the Eastern District of Louisiana and elsewhere. On July 28, 2009, United States District Judge Ivan L.R. Lemelle signed an order authorizing the interception of wire communications over cellular telephone number (504) 402-9853 utilized by WILLIAM STEVENSON (hereinafter referred to as STEVENSON). Interception of wire communications to-and-from this telephone continued until August 16, 2009. Agents were also granted a federal search warrant for text messages sent to and from telephone number (504) 402-9853. Following the termination of the wire interception on STEVENSON's telephone, agents were granted authorization by United States District Judge Ivan L.R. Lemelle to intercept communications over cellular telephones (504)896-

0210 (utilized by MARK ROSS); (832) 724-9881 (utilized by LANDRY GRANDISON); and (281) 302-9107 (utilized by CASSANDRA BATISTE and TROY POCHE). During the course of the investigation, agents learned that STEVENSON conspired with MARK ROSS, LANDRY GRANDISON, TROY POCHE, and CASSANDRA BATISTE to obtain wholesale supplies of heroin that he mixed with cutting agents and packaged for individual distribution to addicts.

GRANDISON, a Houston, Texas resident, who was STEVENSON's primary source of supply also conspired with **DEWAYNE COOPER**, a New Orleans resident, to find quality heroin for distribution. **COOPER** and GRANDISON regularly communicated and were recorded on the wire interception of GRANDISON's phone talking about drug dealers they knew, such as HOWARD LUMAR, JR., and how their heroin and cocaine sales were going. For example, on October 4, 2009, **COOPER** was intercepted with GRANDISON talking about being broke. **COOPER** said he "had a whole relly sitting around." GRANDISON said "what, oh that other one you talking about? **COOPER** says "um-huh, a whole relly sitting around and I got a relly worked out I got to collect. GRANDISON said, "right." **COOPER** said "another relly. I ain't talking about your relly, I ain't talking about 12th grade high school I'm talking about a 24 grown man." Agents would testify that a "relly" is code for 9 ounces of heroin. Agents would also testify that **COOPER** was complaining to GRANDISON how he had 9 ounces of heroin to sell and \$24,000 to collect for the ounces he fronted to other people.

A few days later on October 27, 2009, **COOPER** and GRANDISON were intercepted talking about sources of supply. One of GRANDISON's sources for heroin in 2009 was a Hispanic male referred to as "Joe." **COOPER** told GRANDISON that they needed to get "another Joe Joe together and roll right quick." GRANDISON said, "he's dead right now. I'm

looking.” **COOPER** said “I ain’t talking about him, I’m talking about anyone of ‘em.”

GRANDISON said “Listen, I had another one I don’t know what’s going on. The boy ain’t called me yet. I’m going to tell you this now, if we have any problems, I’m going to fight it. I ain’t going to keep waiting, I’m going to fight it. I ain’t waiting till nothing comes through, I getting my money, I’m going to fight it.” **COOPER** said, “I ain’t heard from him, I ain’t heard from Lou.” **GRANDISON** said “he’s probably still there, he said he would leave in the morning I ain’t texted him today, I don’t want to text him today, I’ll text him tomorrow.” **COOPER** said, “Let me see if I can contact Lou-Lou right quick to see what’s happening” **GRANDISON** said “cool, cool.” Agents would testify that based upon their perceptions as agents monitoring the wire interception when **COOPER** told **GRANDISON** they needed “another Joe Joe,” **COOPER** was referring to getting a second Hispanic connection for a readily available supply of heroin. Agents would also testify that “Lou” was a nickname **GRANDISON** and **COOPER** had for **HOWARD LUMAR, JR.** **COOPER** and **GRANDISON** had another source of supply in common with **LUMAR**.

In a series of intercepted text messages between **GRANDISON** and **COOPER** on October 29, 2009, **GRANDISON** alerted **COOPER** that one of their sources for heroin and cocaine had cocaine for sale. The following texts were exchanged:

GRANDISON: “95”

COOPER: “whats the jersey”.

GRANDISON: “27”

COOPER: “Not bad when”

GRANDISON: "Its down there he claim"

COOPER: "Need 5 but if he let me do me I can do 10"

Testimony at trial would be offered to prove that "95" was code for cocaine hydrochloride. The 95 referred to the year 1995 when **COOPER** was arrested on federal conspiracy charges stemming from cocaine distribution. **COOPER** was interested and asked "whats the jersey?" referring to a price. GRANDISON responded "27" which agents would testify meant \$27,000 for a kilogram. GRANDISON told **COOPER** that the source indicated he already had the cocaine and **COOPER** said he needed "5, but can do 10." Agents would testify that the "5" and "10" referenced kilogram quantities. Telephone calls intercepted immediately following the texts indicated that GRANDISON spoke to ROBERT JOHNSON about what **COOPER** wanted. GRANDISON told JOHNSON that **COOPER** "really like everything." Agents would testify that "everything" is code for a kilogram. **COOPER** called GRANDISON following this call and wanted to know "if there was a better jersey, if I was doing it like that?" Agents would testify that **COOPER** was wanting to know if he could get a better price if he purchased multiple kilograms.

Just prior to STEVENSON's arrest, GRANDISON and STEVENSON conducted a heroin deal which involved **COOPER**. On December 2, 2009, the wire interception of GRANDISON's phone number (832) 724-9881 recorded a series of telephone calls and texts between GRANDISON and **COOPER** wherein GRANDISON and **COOPER** were planning to meet for a deal with STEVENSON. GRANDISON traveled to New Orleans from Houston, Texas via commercial airplane with TROY POCHE in order for POCHE to test the heroin that was to be supplied by **COOPER**. While in New Orleans, POCHE would also meet

STEVENSON to give him a sample of **COOPER's** heroin.

At trial, agents would testify that they saw GRANDISON and POCHE arrive at the Louis Armstrong International Airport and depart the airport in a blue Cadillac sports utility vehicle with a temporary tag driven by a black male who was later positively identified by agents as **COOPER**. On December 3, 2009, at 8:03 a.m. agents monitoring the wire interception of GRANDISON's telephone intercepted a text message between GRANDISON and STEVENSON wherein STEVENSON wrote to GRANDISON "tell him cum on Jackson." STEVENSON maintained a narcotics stash house at 1328 Jackson Avenue, Apartment O, New Orleans, Louisiana. At approximately 8:38 a.m. **COOPER** called GRANDISON and asked if he should bring "a baseball." GRANDISON said "definitely, definitely." At trial, experienced narcotics agents would testify that a "baseball" is a reference to a sample of narcotics. Shortly after this telephone call, agents saw **COOPER** leave his 2315 Bienville Street residence. **COOPER** was followed until he reached a hotel in Metairie where he was observed picking up POCHE and GRANDISON. The group was followed by agents to 1328 Jackson Avenue where agents saw POCHE exit the vehicle and enter the door for a common hallway to 1328 Jackson Avenue, Apartment O. GRANDISON and **COOPER** were followed to a shopping center on Tchoupitoulas Street in New Orleans where they were observed parking in the parking lot.

Approximately five minutes after POCHE arrived at Jackson Avenue, STEVENSON was seen exiting the common door of 1328 Jackson Avenue where agents followed him in his automobile to the B.W. Cooper public housing development. Fifteen minutes after STEVENSON's departure, POCHE was retrieved by GRANDISON and **COOPER**. At trial, testimony would be offered to prove that the sample tested by STEVENSON was part of a ½

kilogram of heroin that GRANDISON and **COOPER** had for sale. Agents would testify that this was not the first time **COOPER** had tried to sell heroin to STEVENSON. At trial, a series of text messages and phone calls would be offered to show that on November 27, 2009, STEVENSON was offered 12 ounces of heroin, but passed on the deal because **COOPER** was charging too much.

At the end of the wire interception, on December 16, 2009, agents executed searches of **COOPER**'s residences. At **COOPER**'s 2315 Bienville Street residence, agents found cocaine hydrochloride. At trial, a forensic chemist would testify that laboratory testing confirmed the substance seized was cocaine hydrochloride with a net weight of 593.1 grams. Agents also seized a Springfield .45 caliber semi-automatic pistol model number 1911-A1, serial number NM212926, two black digital scales, and documents and identification for **COOPER**. A search of 2721 North Claiborne resulted in the seizure of 41.4 net grams of heroin.

Prior to GRANDISON's arrest in Houston on December 17, 2009, agents intercepted a telephone call to GRANDISON from **COOPER** wherein **COOPER** told GRANDISON that agents arrested co-conspirator, HOWARD LUMAR, JR.. **COOPER** told GRANDISON, "it ain't pretty. . . they got Lu Lu, you heard me?" **COOPER** told GRANDISON "they ran into 95." Testimony at trial would be presented to prove that "95" was code **COOPER** and GRANDISON used for cocaine hydrochloride and Lu Lu was a reference to HOWARD LUMAR, JR. Earlier in the day, HOWARD LUMAR, JR. had been arrested and agents seized cocaine hydrochloride and heroin from his residence also.

COOPER was not arrested until February 22, 2010 when agents conducting surveillance at the duplex he owns at 2721 and 2723 North Claiborne saw him enter 2721 North Claiborne.

When agents announced their presence, **COOPER** ran to 2723 North Claiborne and hid. Agents apprehended **COOPER** inside 2723 North Claiborne.

The government and the defendant agree and stipulate that the amount of narcotics that the defendant, **DEWAYNE COOPER**, was responsible for distributing and that was reasonably foreseeable to him as being distributed by co-conspirators in this case is at least 3 kilograms but no more than 10 kilograms of heroin and at least 500 grams but not more than 5 kilograms of cocaine hydrochloride.

COOPER admits that on or about September 26, 1996, in the United States District Court for the Eastern District of Louisiana, under docket number 95-374 “A,” he was convicted of the charge of conspiracy to possess with the intent to distribute cocaine hydrochloride in violation Title 21, United States Code, Section 846. He was sentenced to 60 months imprisonment.

Read and Approved:

DEWAYNE COOPER (Date)
Defendant

JASON WILLIAMS (Date)
Defense Counsel for Dewayne Cooper

EMILY K. GREENFIELD 28587 (Date)
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*

CRIMINAL NO: 09-391

v.

*

SECTION: "K"

CASSANDRA BATISTE

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* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

In the beginning of 2009, agents of the Drug Enforcement Administration (DEA) began an investigation into the drug trafficking activities of WILLIAM STEVENSON and others in the Eastern District of Louisiana and elsewhere. On July 28, 2009, United States District Judge Ivan L.R. Lemelle signed an order authorizing the interception of wire communications over cellular telephone number (504) 402-9853 utilized by WILLIAM STEVENSON (hereinafter referred to as STEVENSON). Interception of wire communications to-and-from this telephone continued until August 16, 2009. Agents were also granted a federal search warrant for text messages sent to and from telephone number (504) 402-9853. Following the termination of the wire interception on STEVENSON's telephone, agents were granted authorization by United States District Judge Ivan L.R. Lemelle to intercept communications over cellular telephones (504)896-

0210 (utilized by MARK ROSS); (832) 724-9881 (utilized by LANDRY GRANDISON); and (281) 302-9107 (utilized by **CASSANDRA BATISTE** and TROY POCHE). During the course of the investigation, agents learned that STEVENSON conspired with MARK ROSS, LANDRY GRANDISON, TROY POCHE, and **CASSANDRA BATISTE** to obtain wholesale supplies of heroin that he mixed with cutting agents and packaged for individual distribution to addicts.

At trial, agents would testify that GRANDISON was one of STEVENSON's sources of supply for heroin. At the time of the conspiracy, GRANDISON, **BATISTE** and POCHE, all New Orleans natives, lived in Houston, Texas. GRANDISON would pay for POCHE to travel on commercial airline flights from Houston to New Orleans with samples of heroin for STEVENSON to inspect and determine if he wanted to purchase a larger quantity. POCHE would travel back to Houston with the money STEVENSON gave him. Once GRANDISON got word that STEVENSON wanted the larger quantity of heroin, he would send **BATISTE** on a commercial airline to body carry the quantity of heroin to STEVENSON in New Orleans.

In August 2009, agents would testify that the wire interception of STEVENSON's telephone was intercepting conversations confirming POCHE's meetings with STEVENSON. For example, agents would testify that on August 12, 2009, STEVENSON was intercepted on phone number (504) 402-9853 giving POCHE \$28,000 on Jackson Avenue in New Orleans. After their meeting, STEVENSON and GRANDISON exchanged the following text messages over STEVENSON's cellular telephone:

GRANDISON: "he didnt tell u about the 4"

STEVENSON: "4 how much?"

GRANDISON: "U just jacked me out 2"

STEVENSON: "Cum back".

GRANDISON: "28"

STEVENSON: "Thats what i gave him"

GRANDISON: "Thats why i said u jack me out 2 dollars"

STEVENSON: "Cum on bra im struggling na"

GRANDISON: "Lucky i luv u win this one 75 for 4"

STEVENSON: "send it and ima send the bread back with them"

Agents would testify that these text messages confirm that STEVENSON gave POCHE \$28,000 which was \$2,000 short of the \$30,000 GRANDISON charged for a ½ kilogram of heroin. GRANDISON agreed to accept the \$28,000 when he said "lucky i luv u" and then offered STEVENSON another 4 ½ ounces of heroin for \$7500. STEVENSON accepted the offer for additional heroin when he told GRANDISON to send it and he would send the money ("bread") back with them (**BATISTE** and POCHE).

The following day, **BATISTE** traveled from Houston to New Orleans on a commercial airline. The wire on STEVENSON's phone intercepted the conversation between **BATISTE** and STEVENSON after **BATISTE** arrived at the Louis Armstrong International airport. **BATISTE** called STEVENSON at 2:10 p.m. and said "Yeah, I'm here how we doing this?" STEVENSON said "stay there, I'm going to come there." An hour later, STEVENSON and **BATISTE** talked again. STEVENSON asked **BATISTE**, "you going to be upstairs or downstairs?" **BATISTE** answered "downstairs." STEVENSON said "alright, you can come out in like five minutes." Agents would testify that STEVENSON was picking **BATISTE** up at the lower level or baggage claim of the airport.

At trial, agents would testify that based on the wire intercepts, surveillance, and toll analysis GRANDISON continued to supply STEVENSON until the end of 2009 when DEA agents arrested STEVENSON. Testimony would be offered to prove that STEVENSON typically purchased 1/4 kilogram or 1/2 kilogram quantities from GRANDISON.

At trial, documents from one commercial airline would be introduced to prove that prior to the wire interception, from January 2009 through July 2009, POCHE traveled from Houston to New Orleans 35 times and **BATISTE** traveled from Houston to New Orleans 34 times. The tickets, which were primarily for one-way flights and purchased the same day of travel, were paid for in cash or by credit cards or debit cards associated with GRANDISON. Agents would testify that the wire intercepts of **BATISTE** and POCHE's telephone and GRANDISON's telephone, revealed that **BATISTE** and POCHE were addicts who GRANDISON supplied with heroin. The trips **BATISTE** and POCHE made to and from New Orleans were to mule money and heroin between GRANDISON and STEVENSON.

The government and the defendant agree and stipulate that the amount of narcotics that the defendant, **CASSANDRA BATISTE**, was responsible for distributing and that was reasonably foreseeable to her as being distributed by co-conspirators in this case is at least 3 kilograms but no more than 10 kilograms of heroin.

Read and Approved:

CASSANDRA BATISTE (Date)
Defendant

SANDRA JENKINS (Date)
Defense Counsel for Cassandra Batiste

EMILY K. GREENFIELD (Date)
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*

CRIMINAL NO: 09-391

v.

*

SECTION: "K"

**CHARLES WADE
a/k/a "Poosy"**

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* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

In the beginning of 2009, agents of the Drug Enforcement Administration (DEA) began an investigation into the drug trafficking activities of WILLIAM STEVENSON and others in the Eastern District of Louisiana and elsewhere. On July 28, 2009, United States District Judge Ivan L.R. Lemelle signed an order authorizing the interception of wire communications over cellular telephone number (504) 402-9853 utilized by WILLIAM STEVENSON (hereinafter referred to as STEVENSON). Interception of wire communications to-and-from this telephone continued until August 16, 2009. Agents were also granted a federal search warrant for text messages sent to and from telephone number (504) 402-9853. Following the termination of the wire interception on STEVENSON's telephone, agents were granted authorization by United States District Judge Ivan L.R. Lemelle to intercept communications over cellular telephones (504)896-

0210 (utilized by MARK ROSS); (832) 724-9881 (utilized by LANDRY GRANDISON); and (281) 302-9107 (utilized by CASSANDRA BATISTE and TROY POCHE). During the course of the investigation, agents learned that STEVENSON conspired with MARK ROSS, LANDRY GRANDISON, TROY POCHE, and CASSANDRA BATISTE to obtain wholesale supplies of heroin that he mixed with cutting agents and packaged for individual distribution to addicts in the B.W. Cooper Housing Development in New Orleans. STEVENSON would redistribute to a group of retail dealers in the housing projects and ROSS would redistribute to addicts and other drug dealers in the New Orleans Metropolitan area.

At trial, the wiretap of ROSS's telephone would be offered into evidence to show that ROSS routinely communicated with an individual later identified as **CHARLES WADE** also known as "Poosy." From September 12, 2009 through October 10, 2009, **WADE** and ROSS were intercepted over 40 times on the wiretap planning when and where they would meet. For example, on September 12, 2009, ROSS was intercepted calling **WADE** asking him if he was ready to move. **WADE** said "give me a few minutes, I'm dropping my old lady off at the hair dresser. ROSS told **WADE** to "hit me." Witnesses at trial would testify that when ROSS asked **WADE** if he was ready to move ROSS was inquiring about whether **WADE** was ready to purchase heroin from ROSS. The same day, two hours later, ROSS received a phone call from **WADE**. ROSS asked **WADE** when he would be ready. **WADE** responded that he was ready and they agreed to meet at the Rite-Aid at Canal and Broad in New Orleans. At trial, witnesses would testify that during the time of the DEA investigation **WADE** purchased 2 1/4 ounce increments of heroin from ROSS on approximately 10 occasions. **WADE** admits that prior to 2009 he had purchased distributable quantities of heroin from ROSS and other sources for resale

to addicts in and around the B.W. Cooper public housing development.

The government and the defendant **CHARLES WADE** agree and stipulate that the amount of narcotics he was responsible for distributing and that was reasonably foreseeable to him as being distributed by his co-conspirators in this case is at least 1 kilogram but not more than 3 kilograms of heroin.

Read and Approved:

CHARLES WADE (Date)
Defendant

CATHERINE CHAVARRI (Date)
Defense Counsel for Charles Wade

EMILY K. GREENFIELD # 28587 (Date)
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*

CRIMINAL NO: 09-391

v.

*

SECTION: "K"

**GENERIO ALLEN
a/k/a "Neery"**

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FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

In the beginning of 2009, agents of the Drug Enforcement Administration (DEA) began an investigation into the drug trafficking activities of WILLIAM STEVENSON and others in the Eastern District of Louisiana and elsewhere. On July 28, 2009, United States District Judge Ivan L.R. Lemelle signed an order authorizing the interception of wire communications over cellular telephone number (504) 402-9853 utilized by WILLIAM STEVENSON (hereinafter referred to as STEVENSON). Interception of wire communications to-and-from this telephone continued until August 16, 2009. Agents were also granted a federal search warrant for text messages sent to and from telephone number (504) 402-9853. Following the termination of the wire interception on STEVENSON's telephone, agents were granted authorization by United States District Judge Ivan L.R. Lemelle to intercept communications over cellular telephones (504)896-

0210 (utilized by MARK ROSS); (832) 724-9881 (utilized by LANDRY GRANDISON); and (281) 302-9107 (utilized by CASSANDRA BATISTE and TROY POCHE). During the course of the investigation, agents learned that STEVENSON conspired with MARK ROSS, LANDRY GRANDISON, TROY POCHE, and CASSANDRA BATISTE to obtain wholesale supplies of heroin that he mixed with cutting agents and packaged for individual distribution to addicts in the B.W. Cooper Housing Development in New Orleans.

At trial, evidence would be presented to show that STEVENSON distributed approximately 4 bundles of heroin weighing 25 grams each to retail distributors in the B.W. Cooper Housing Development every day. The retail distributors included, but were not limited to, **GENERIO ALLEN** also known as “Neery,” FELTON WEST also known as “Doony,” KENNAIRE MATHIEU also known as “Bull,” JERMAINE WILLIAMS also known as “J-Wicked” or “Wicked,” ERROL HALL, also known as “Giz,” JIMMY ISAAC also known as “Stink,” MICHAEL MINOR also known as “Perp,” “Yerp,” and “Ashy Black.” At trial, testimony and evidence from **ALLEN’S** June 2009 arrest for possession with intent to distribute heroin and phone calls from the wire interception of STEVENSON’s cellular telephone in August 2009 would be presented to prove that throughout 2009, **ALLEN** sold heroin for STEVENSON. For example, on August 2, 2009, **ALLEN** called STEVENSON and told him “when they finish all that roll over shit, I’m going first, you heard me?” STEVENSON asked “you got yours?” **ALLEN** said “where they at, who got them.” STEVENSON said “Goofy came and brought two of them out.” **ALLEN** asked “who he gave them to?” STEVENSON said “I don’t know, go back there and ask him.” **ALLEN** said “alright, I was just making sure because they say they was going to let me go first today.” Witnesses at trial would testify that

ALLEN was informing **STEVENSON** that **ALLEN** desired to have a bundle of heroin so that he could be the first to sell in the driveways. The retail distributors working for **STEVENSON** would take shifts selling their bundles of heroin. If a retail distributor did not finish selling the entire bundle of heroin on one shift, he held it as a “roll-over” for the next day. **ALLEN** was informing **STEVENSON** that the other distributors agreed that once the roll-over bundles were sold, **ALLEN** could have the first shift to sell a new bundle. **STEVENSON** told **ALLEN** that **MICHAEL PINKNEY** also known as “Goofy” had brought two new bundles to the driveway for distribution.

Agents and witnesses would also testify that during the time of the conspiracy, **STEVENSON, ALLEN, MATHIEU, WILLIAMS, HALL, ISAAC, MINOR** and **WEST** routinely purchased firearms and possessed firearms for protection from those who would try to steal their bundles of heroin or the money they made from selling heroin. **STEVENSON, ALLEN, MATHIEU, WILLIAMS, HALL, ISAAC, MINOR** and **WEST** additionally possessed firearms for protection from rival groups of drug dealers. Law enforcement officers and witnesses would testify that a number of the guns **STEVENSON, ALLEN, MATHIEU, WILLIAMS, HALL, ISAAC, MINOR** and **WEST** possessed were stashed under porches and in apartments of the B.W. Cooper Public Housing Development where the group sold heroin.

At trial, evidence from the wire interception of **STEVENSON**'s telephone would be offered to show that **ALLEN** possessed assault weapons and an additional gun in an apartment in the B.W. Cooper housing development while he was selling heroin in the driveway of the apartment. On August 12, 2009, **STEVENSON** and **ALLEN** were intercepted on the telephone discussing how law enforcement officers were looking for **MICHAEL MINOR** also known as

“Perp or Yerp.” ALLEN asked STEVENSON “so don’t come out right now?” STEVENSON replied that ALLEN should not come unless he was going to stay on M.A.’s porch. Witnesses at trial would testify that M.A. was related to ALLEN’s girlfriend. ALLEN told STEVENSON he was “not about to get this bitch hot, not with all the choppers in this bitch, and I got another gun.” Witnesses would testify that a “chopper” is a nickname for an assault weapon. STEVENSON and ALLEN continued to talk about the presence of law enforcement and what actions by MINOR prompted law enforcement to look for him. At trial, testimony and evidence would be presented to prove that ALLEN and the distributors of heroin in the driveway of the B.W. Cooper were careful to try to detect when and where law enforcement were so that they would not be caught selling heroin.

The government and the defendant **GENERIO ALLEN** agree and stipulate that the amount of narcotics he was responsible for distributing and that was reasonably foreseeable to him as being distributed by his co-conspirators in this case is at least 1 kilogram but not more than 3 kilograms of heroin.

Read and Approved:

GENERIO ALLEN (Date)
Defendant

MARION FLOYD# (Date)
Defense Counsel for Generio Allen

EMILY K. GREENFIELD # 28587 (Date)
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL NO: 09-391

v.

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SECTION: "K"

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LEONARD WHITE

* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

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0210 utilized by MARK ROSS; (832) 724-9881 utilized by LANDRY GRANDISON; (281) 302-9107 utilized by CASSANDRA BATISTE and TROY POCHE; and (504) 281-7430 utilized by HOWARD LUMAR, JR. During the course of the investigation, agents learned that STEVENSON conspired with MARK ROSS, LANDRY GRANDISON, TROY POCHE, and CASSANDRA BATISTE to obtain wholesale supplies of heroin that he mixed with cutting agents and packaged for individual distribution. STEVENSON also conspired with MARK ROSS and other individuals known and unknown to acquire quantities of cocaine hydrochloride.

During the interception of STEVENSON's telephone, agents intercepted a series of telephone calls wherein STEVENSON was assisting his cousin later identified as **LEONARD WHITE** also known as "Screwdriver Head," procure cocaine. At trial, agents and witnesses would testify that on August 4, 2009, STEVENSON called MARK ROSS to contact a supplier of cocaine hydrochloride for **WHITE**. ROSS asked STEVENSON if he wanted him to call the "one you beefin' with behind a female?" STEVENSON confirmed that was who he wanted ROSS to contact.

In a subsequent call the same day, ROSS called STEVENSON and said "why don't you hit dude and see what he wanted?" STEVENSON told ROSS "the whole thing." ROSS told STEVENSON "hold on." There was a long pause on the conversation then ROSS said, "he said he will talk to him when he sees him tomorrow so what is a good time?" STEVENSON said "he wants to talk to my people?" ROSS said, "yeah, let him meet him, let him meet him, you ain't got to go through that and I don't have to go through that." ROSS said, "he said you all could hook up tomorrow." STEVENSON said he was going to call his people. Agents and witnesses would testify that "whole thing" is code for one kilogram and that **WHITE** wanted to purchase a

kilogram of cocaine. The person who was to supply **WHITE** the kilogram of cocaine and to whom ROSS was also speaking with while on the phone with STEVENSON was KEVIN TYLER.

The next call STEVENSON made after speaking to ROSS was to **WHITE**. STEVENSON asked **WHITE** what time he was getting up in the morning because he was going to get hooked up. Agents and witnesses would testify that the next day multiple phone conversations occurred between STEVENSON and ROSS discussing the whereabouts of TYLER.

On August 6, 2009, STEVENSON and **WHITE** were intercepted planning to meet at 1:00 p.m. At approximately 1:47 p.m., STEVENSON called **WHITE** and told him "I got your boy right here, he is going to meet you." **WHITE** said he was on his way uptown now and STEVENSON told him to meet him at the Advanced Auto Parts on Claiborne. **WHITE** admits that TYLER gave him a kilogram of cocaine hydrochloride after this meeting.

On August 7, 2009, **WHITE** called STEVENSON and told him that he wanted STEVENSON to get in touch with your boy because **WHITE** had a problem. Agents would testify that multiple telephone conversations between STEVENSON, ROSS and **WHITE** were exchanged in an attempt to locate TYLER. At approximately, 12:00 p.m. agents conducting surveillance on **WHITE**'s residence saw him leave in his black Camry and meet with the driver of a Silver Acura LT bearing Louisiana License plate PWU661. The Silver Acura LT was registered to TYLER. **WHITE** admits that he returned the kilogram of cocaine to TYLER because it was not suitable for resale.

The government and the defendant agree and stipulate that the amount of narcotics that the

defendant, **LEONARD WHITE**, was responsible for during this conspiracy was at least 500 grams but not more than 2 kilograms of cocaine hydrochloride.

Read and Approved:

LEONARD WHITE (Date)
Defendant

FRANK SLOAN (Date)
Defense Counsel for Leonard White

EMILY K. GREENFIELD #28587 (Date)
Assistant United States Attorney