

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

UNITED STATES OF AMERICA

*

CRIMINAL NO: 09-391

v.

*

SECTION: "K"

**MICHAEL PINKNEY
a.k.a "Goofy Gangster"
or "Stupid Gangster"**

*

* * *

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 employed **MICHAEL PINKNEY**, also known as “Goofy Gangster” or “Stupid Gangster,” for a period of months to package wholesale quantities of heroin for individual distribution. **PINKNEY** would package 25 grams of heroin into bundles of 80-100 aluminum foil dosage units (.2 to .3 grams per foil). Per STEVENSON’s instructions, **PINKNEY** would distribute approximately 4 of these 25 gram bundles every day to either 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” or “Rilla,” MICHAEL MINOR also known as “Perp,” “Yerp,” and “Ashy Black,” and/or others for them to distribute to addicts frequenting the B.W. Cooper Housing Development. At trial, evidence would be presented to prove that, except for brief periods of time when they were incarcerated, ALLEN, WEST, MATHIEU, WILLIAMS, HALL, ISAAC, and MINOR, sold heroin for STEVENSON continuously throughout the year 2009.

The government and the defendant **MICHAEL PINKNEY** 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 3 kilograms but not more than 10 kilograms of heroin. The government and the defendant **MICHAEL PINKNEY** agree that he was not responsible for distributing cocaine hydrochloride.

Read and Approved:

MICHAEL PINKNEY (Date)
Defendant

JOSEPH A. MARINO, Jr. # (Date)
Defense Counsel for Michael Pinkney

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