

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

**UNITED STATES OF AMERICA**

v.

**THEODORE GRIFFIN**

\* **CRIMINAL NO.: 14-59**

\* **SECTION: "N"**

\* **VIOLATION: 21 USC § 846**

\* \* \*

**FACTUAL BASIS**

Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimony and other evidence, the following facts to support the allegations against the defendant, **THEODORE GRIFFIN**.

Beginning in or around December 2012, the defendant, **THEODORE GRIFFIN**, combined, conspired, confederated, and agreed with **TERENCE TAYLOR**, and other persons to distribute heroin in the New Orleans area. In furtherance of the conspiracy, **GRIFFIN** permitted his residence located at 4848 Deanne Street in New Orleans to be used as base of operations for the heroin distribution activities of **TAYLOR** and others. **TAYLOR** utilized this location as a safe location to store his heroin, meet his suppliers, and sell wholesale quantities of heroin to other heroin dealers.

Court-authorized wire intercepts, physical surveillance, and reliable witness statements demonstrate that **GRIFFIN** monitored the heroin stash locations that TAYLOR maintained within vehicles parked at 4848 Deanne Street and within an abandoned residence next door on TAYLOR's behalf. **GRIFFIN** communicated with TAYLOR by cellular telephone regarding the safety of TAYLOR's heroin stash and whether suspected law enforcement officers were in the area. At TAYLOR's direction, **GRIFFIN** also distributed gram quantities of heroin to street-level customers.

**GRIFFIN** was present at times when TAYLOR sold quantities of heroin to heroin dealers TERRELL DAVIS, MALCOLM BOLDEN, MELVIN SMITH, and PERCY DEPRON, and at times when the heroin was packaged for sale at the residence of NARCISSE TROTTER. **GRIFFIN** was also present on many occasions when TAYLOR sold gram quantities of heroin to street-level customers, and he was aware that TAYLOR would sell heroin to up to twenty or thirty customers per day.

#### **Drug Quantities**

The government and the defendant, **THEODORE GRIFFIN**, stipulate and agree that the defendant should be held accountable for at least one kilogram but less than three kilograms of heroin, as this amount of heroin was distributed during the course of the conspiracy as a result of the defendant's conduct and the reasonably foreseeable conduct of his co-conspirators within the timeframe of the Superseding Indictment.

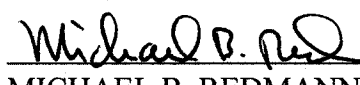
**Limited Nature of Factual Basis**

This proffer of evidence is not intended to constitute a complete statement of all facts known by the defendant, **THEODORE GRIFFIN**, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the defendant's plea of guilty to Count 1 of the Superseding Indictment.


**APPROVED AND ACCEPTED:**

  
\_\_\_\_\_  
THEODORE GRIFFIN  
Defendant

8/17/2015  
(date)

  
\_\_\_\_\_  
MICHAEL B. REDMANN  
Assistant United States Attorney

8/25/2015  
(date)

  
\_\_\_\_\_  
WILLIAM M. SOTHERN  
Counsel for Defendant

8/17/2015  
(date)