

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

**UNITED STATES OF AMERICA**

**\* CRIMINAL NO. 19-204**

**v.**

**\* SECTION: "R"**

**ALLEN ROBERTSON**

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**\* \* \***

**FACTUAL BASIS**

The defendant, **ALLEN ROBERTSON**, has agreed to plead guilty as charged to Count One of the superseding indictment, which charges the defendant with conspiring to distribute and to possess with the intent to distribute a 100 grams or more of a mixture/substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 846, 21 U.S.C. § 841(a)(1), and 21 U.S.C. § 841(b)(1)(B).

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, many of which occurred in the Eastern District of Louisiana, beyond a reasonable doubt, to support the allegations in the superseding bill of information now pending against the defendant:

By the spring of 2019, the Federal Bureau of Investigation ("FBI") had identified ROY LEE JR as a high-level drug trafficker who was moving kilogram quantities of heroin from Houston to New Orleans and serving as a high-level supplier for New Orleans. Lacking a confidential source who could purchase heroin directly from ROY LEE JR, the FBI decided to target ROY LEE SR, ROY LEE JR's father, as a means of entry into ROY LEE JR's drug trafficking organization.

In the late spring of 2019, the FBI used a confidential human source to make a series of controlled purchases of heroin from ROY LEE SR. Through this activity, the FBI amassed sufficient probable cause to conduct wire intercepts of ROY LEE SR's telephone. The FBI applied for and received authorization to interception ROY LEE SR's telephone in June 2019. The intercept of ROY LEE SR's phone lasted thirty days.

The FBI was able to use probable cause developed during the interception of LEE SR's phone to begin interceptions of LEE JR's phone in early July 2019. The FBI ultimately intercepted two of LEE JR's phones for a total of approximately 50 days between July and September 2019. These interceptions provided strong evidence of LEE JR's trafficking activities, including the structure of his organization and roles of various associates, his primary source of supply, and the identities of numerous customers who purchased from him. Agents also determined that LEE JR dealt primarily out of [REDACTED] at the Esplanade at City Park Apartments during the period when wire intercepts on his phones were active.

**ALLEN ROBERTSON** is LEE JR's brother in law. **ROBERTSON** was intercepted discussing the purchase of heroin from LEE JR several times during the wire. For example, on July 7, 2019, **ROBERTSON** was intercepted asking LEE JR, "Is it a chance you could do uh, do the fourteen and a fourteen?" This call was in reference to splitting an ounce of heroin, which is approximately twenty-eight grams, into two fourteen gram bags. **ROBERTSON** also assisted LEE JR in making sales. For example, on July 15, 2019, co-defendant Jeffrey HOLMES was purchasing heroin from LEE JR, and LEE JR had **ROBERTSON** consummate the transaction in front of the Esplanade at City Park Apartments. The wire intercept captured a series of calls between HOLMES and LEE JR, including one in which LEE JR told HOLMES "Yeah Unc, **Allen**

[**ROBERTSON**] coming out now.” HOLMES responded, “Yeah. I know, I talked to him.”

Shortly thereafter, surveillance agents observed **ROBERTSON** serving HOLMES.

On November 18, 2019, agents arrested **ROBERTSON** on a federal warrant while he was at his house in Chalmette. During a consent search of the house, agents found sandwich bags, a digital scale with heroin residue, and heroin.

The government and **ROBERTSON** stipulate and agree that he should be held accountable for at least 400 grams of heroin but less than 700 grams of heroin.

The limited purpose of this factual basis is to satisfy the Court that there is a sufficient basis in fact for **ROBERTSON**’s guilty plea. This document does not contain all information known to the government about the charged conspiracy to distribute heroin.

  
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David Haller Date  
Assistant United States Attorney

  
\_\_\_\_\_  
Roger Jordan Date  
Attorney for Allen Robertson

  
\_\_\_\_\_  
Allen Robertson Date  
Defendant