

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

CRIMINAL NO. 13-137

VERSUS

SECTION "H"

ANDRE ADDISON

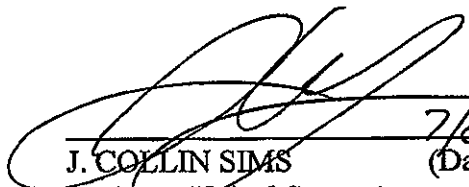
FACTUAL BASIS

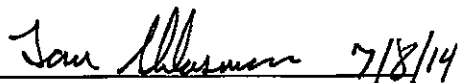
The above-named defendant, Andre ADDISON, has agreed to plead guilty pursuant to a plea agreement with the Government to Count 1 of the Second Superseding Bill of Information. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, the following facts to support the allegations against the defendant, Andre ADDISON (hereafter referred to as ADDISON):

Count 1- Drug Trafficking Conspiracy <sup>TS</sup>

From on or about January 4, 201<sup>3</sup>~~4~~, to on or about January 6, 201<sup>3</sup>~~4~~, ADDISON communicated via cell phone with Byron Evans in order to coordinate the purchase and receipt of approximately nine (9) ounces of heroin from Byron Evans. On or about January 6, 201<sup>3</sup>~~4~~, ADDISON received nine (9) ounces of heroin in the Eastern District of Louisiana from a drug courier sent by Byron Evans. ADDISON intended to distribute the nine (9) ounces of heroin. <sup>JCS</sup>

These facts are merely a summary of ADDISON's criminal activity and are presented in this document to support his plea of guilty to Count One the Second Superseding Bill of Information.

  
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J. COLLIN SIMS (Date) 7/8/14  
Assistant United States Attorney  
LA Bar Roll No. 30727

  
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THOMAS W. SHLOSMAN (Date) 7/8/14  
Attorney for Defendant  
LA Bar Roll No.

  
\_\_\_\_\_  
ANDRE ADDISON (Date) 7-8-14  
Defendant